

WISHA REGIONAL DIRECTIVE

WISHA Services

Department of Labor and Industries

29.50 Warning Lines Used For Fall Protection in Construction Date: May 24, 2005

I. Background

Falls from elevation are one of the leading causes of serious injury or death in the construction industry. For this reason, the Department of Labor and Industries (L&I) has adopted a number of standards intended to protect workers from such hazards. Recently, the department has received a number of questions related to the use of a warning line. Specifically, some employers have asked whether it is acceptable to use warning lines as a fall protection system on walking/working surfaces in lieu of standard guardrails or the equivalent. L&I has also received several questions regarding the use of highly visible caution or danger tape as the warning line.

II. Scope and Application

This WISHA Regional Directive (WRD), which remains in effect indefinitely, provides guidance to WISHA staff regarding the use of a warning line system for fall protection in construction. It replaces all previous guidance on the subject, whether formal or informal.

III. Interpretive Guidance

A. *When is it acceptable to use warning lines for fall protection?*

WAC 296-155, Part C-1 recognizes warning lines as a method of fall protection only during roof work on low-pitched roofs (WAC 296-155-24515(1)(b)) or during leading edge activities (WAC 296-155-24520(1)).

If an employer engaged in low-pitched roof work or leading edge work elects to use the warning line system as a fall protection method, the employer must meet all of the criteria for a warning line as outlined in the standard. If there are deficiencies in the warning line system, the employer is in violation of WAC 296-155-24510 for not providing a fall protection system that meets the requirements of Part C-1.

- B. *Is an employer in violation when using a warning line system to provide fall protection to employees working on an open-sided surface or around floor openings subject to WAC 296-155, Part K?*

Yes, WAC 296-155, Part K requires that open-sided surfaces that are 4 feet or more above an adjacent surface be guarded with standard railing or the equivalent. A warning line does not provide fall protection equivalent to that provided by a standard guardrail.

- C. *Is there any time that the department would accept a warning line as equivalent protection for the guarding of open-sided surfaces or floor openings subject to WAC 296-155, Part K?*

Yes, the department would consider the use of a warning line to provide fall protection to employees working on an open-sided surface or around floor openings *de minimis* and therefore not a violation *if* an employer meets *all* of the following criteria:

1. The warning line is erected at least 15 feet from the unprotected edge.
2. The warning line meets all other criteria listed in WAC 296-155-24515(3).
3. Employees have been trained in the use of the warning line, its limitations and the requirement for additional fall protection when working outside of the warning line.
4. When the fall hazard is 10 feet or more, the employer must comply with the fall protection work plan requirements in WAC 296-155-24505.

If the employer has not met ALL of the above criteria, the employer is in violation of WAC 296-155, Part K for not guarding open-sided surfaces with standard railing or equivalent.

- D. *Can an employer use highly visible caution or danger tape as the warning line in lieu of a flagged rope or chain?*

Yes, 3-inch wide by 3 or 4 mils thick, highly visible caution or danger tape exceeds the 200 lb. tensile strength required for a warning line. If an employer uses highly visible caution or danger tape for the warning line, WISHA will accept it as equivalent to a flagged rope or chain warning line.

Approved: _____

Mel James, Acting Senior Program Manager
WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 -- or by telephone at (360) 902-5503. You also may review policy information on the WISHA Website (<http://www.lni.wa.gov/Safety/>).